

DEPARTMENT OF COMMUNITY INITIATIVES

POLICY MEMORANDUM

Subject: **Training and Supportive Service Allowances
For DCI Divisions, Delegate Agencies & Subcontractors**

Effective Date: **February 1, 2004**

Purpose: This Department of Community Initiatives (DCI) policy provides Divisions, Delegate Agencies, and Subcontractors with procedures, allowances, and requirements for use of City of San Antonio (COSA) General Funds and DCI provided grant (non-General Fund) funds for job, skill or life skill training and supportive services. The policy also stipulates internal DCI monitoring requirements to ensure compliance.

Executive Summary: This policy:

1. Establishes maximum household income eligibility levels for a participant to receive training or support services via a DCI authorized program.
2. Defines allowable expenses for training, education, and supportive services
3. Establishes maximum dollar and time limitations per person for training, education and supportive services.
4. Describes participant conditions that must be met in order to receive various services via a DCI authorized program.
5. Establishes requirements for support documentation when training, education or supportive services are provided.
6. Defines a waiver process that may be followed in situations that do not meet the requirements of the policy.

Definitions: Training costs include tuition, academic or training fees, books, testing or assessment fees, and training supplies, including tools for job training programs. Supportive services include, but are not limited to, childcare, mortgage, rental, food or utility assistance, transportation, and other work related expenses to include stipends, gift cards and other incentive items. Use of the term “manager” in this policy refers to the DCI division or program manager or the most senior delegate agency manager as appropriate, unless otherwise specified.

Policy: This policy applies to all DCI Divisions, Delegate Agencies, and Subcontractors and is intended to provide uniform and consistent training and supportive services for participants in DCI funded programs. This policy will be incorporated into and become a part of all Delegate Agency and Subcontractor contracts.

Conflicts: This DCI policy only supplements grantor requirements. In all cases, funding source procedures and program requirements for eligibility and supportive services will be followed if they conflict with this policy. Additionally, funding source guidelines may be followed if they permit higher allowances than authorized by this policy.

Monitoring: DCI contract monitors and Quality Assurance Section personnel will follow Department Directive 30 (Contract Monitoring) and will review Delegate Agency and

Subcontractor records to ensure eligibility, job training, and supportive service requirements are met and documented. DCI monitors will report non-compliance as required by DD 30. The DCI Director will require the Delegate Agency or Subcontractor to refund all costs incurred for services provided to ineligible participants.

Funding Priorities: In situations where limited funding requires a prioritization of participant needs, program participants will be served in the following order:

- Elderly (over 60)
- Certified disabled
- Critical care customer (CPS certified)
- Households with children 3 years of age or younger

Eligible individuals requiring crisis assistance may be served without regard to these priorities and no individual already receiving services will have any service terminated because of new participants with a higher needs priority.

Agencies with multiple funding sources should use their most restrictive funding source first for program participants. If possible, COSA provided resources (particularly CSBG and General Fund) should be used only if a participant does not qualify to receive services from another funding source.

Basic Income Eligibility: Training is available to individuals regardless of income level and funding limits vary based on the length of training and the goal of such training. Support services may be available to individuals who meet DCI's basic income eligibility test. To be eligible for initial and continued support services an applicant's annualized household annual income at the time support services are provided may not exceed 200% of the FPL. The FPL guidelines (revised annually) for fiscal year 2003 are included as Attachment A. Any participant who exceeds the maximum income level while receiving supportive services may no longer receive supportive services unless the Director approves a written exception. Service providers must document their definition and calculation of annualized income.

DCI's income eligibility requirements should be deemed maximum levels. If the funding source requires more stringent income requirements, the more stringent requirements will be followed. Because of other funding source requirements, funding levels or service capacity, service providers may follow lower levels, at their discretion, if allowed by the funding source provided they are followed on a universal and consistent basis.

Exception Process: Dollar limitations or other eligibility requirements for training and supportive services may be waived on an individual basis for extenuating circumstances or unusual personal situations. Individual's not meeting income or other requirements of this policy may receive training or support services via a written exception to this policy as follows:

- a. Income eligibility. If an individual exceeds the DCI basic income eligibility requirements for a specific support service, a request may be submitted in writing to the Director for approval prior to the provision of the particular support service.
- b. Crisis intervention. If an income eligible participant requires immediate support services to address a crisis situation such service(s) may be provided on a one-time basis for a period not to exceed seven calendar days in an amount not to exceed \$250 without the requirement to document service or denial from other another agency or service provider.

- c. If a DCI grant funding source specifically allows more generous training or support services or allows a higher income level such allowance will be documented once and forwarded to the Director for approval.

All exceptions require written approval by the Director unless waiver or approval authority has been delegated in writing to the appropriate Division/Program or agency manager.

ELIGIBILITY & PROGRAM REQUIREMENTS

All funding source eligibility requirements must be met and documented in the participant file before any training or supportive services may commence.

Attachment B provides a summary matrix of eligibility and program requirements and limitations for all authorized training and supportive services. All dollar or time limitations are per agency per applicant unless otherwise stated.

Individuals receiving education, training or support services from any DCI program are strongly encouraged to participate in the Department's Family Economic Security Program (FESP.) All service providers should advise participants of the features, benefits and qualifications for:

- a. Financial Literacy programs
- b. Volunteer Income Tax Assistance (VITA) program
- c. Individuals Development Accounts (IDA)

REMEDIAL EDUCATION AND JOB/SKILL TRAINING REQUIREMENTS

DCI supports short-term remedial education necessary to receive training and job and occupational skill training with a goal of placing participants in permanent employment or transitioning them into self-sustaining employment.

All managers are responsible for knowing current Texas Workforce Commission (TWC) training and support services opportunities and requirements and for referring all eligible applicants to a TWC workforce center if appropriate. If TWC training or support services are available for a qualified applicant, those resources should be utilized first to the extent possible or practical before COSA funds are committed.

Long-Term training may be provided only in targeted demand occupations (or a first level directly related occupation) as identified by the Alamo Workforce Development Board (AWD). Long-term training may also be approved for customized training programs if the employer has provided a written agreement to employ graduates of the training program at a wage of not less than \$10.00 per hour. Occupations not on the approved occupation list may be requested to be added to the list via written request to the Director. A list of Target (Demand) Occupations for 2003 is included as Attachment C.

Short-term training is supported if it has a goal of immediate transitional job placement. Training providers (e.g. Project QUEST, Goodwill, and YO) may use DCI provided funds to purchase direct training services from other providers, but only for approved occupations or programs as outlined above. Additionally, certain grant-funded programs for job training may require use only of certain approved training vendors, as specified by the funding source. All COSA and funding source procedures and requirements for the purchase and payment of training services

must be followed. DCI provided funds may not be used to purchase training that does not result in a marketable skills certificate in a targeted or approved occupation.

Applicants who are skilled or have been previously employed in a targeted occupation may receive training or support services via a DCI funded program if:

- a. They are currently earning less than \$10.00 per hour or receive prior written approval from the Director (or manager if so delegated.)
- b. They received their training from an entity other than the City
- c. Their training was for an occupation that is no longer identified as a demand occupation
- d. They are a displaced working requiring re-training in order to become re-employed.

DCI supports both short and long-term job and occupational skill training and short-term remedial education as follows:

- a. Short-term training of less than six months is authorized for placement in transitional (less than a living wage) employment. It is intended to provide the participant with:
 - Immediate placement and income
 - Basic employability skills
 - Character trait development
 - Creditable job experience for transition to a living wage

Total short-term training costs may not exceed \$1,000 per person per lifetime and total supportive services for income eligible participants may not exceed \$1,000 per person per lifetime plus childcare for the duration of training (at the current CCDS rate) for income eligible participants unless specifically authorized in writing by DCI or the funding source.

- b. Short-term occupational training (including a compressed schedule) of less than six months is authorized for permanent placement at or above the “living wage,” preferably in a demand occupation. Total training costs may not exceed \$2,000 per person per lifetime and total supportive services may not exceed \$1,000 per person per lifetime plus childcare for the duration of training (at the current CCDS rate) for income eligible participants unless specifically authorized in writing by DCI or the funding source.
- c. Long-term occupational training (more than six months) is authorized for permanent placement in a targeted (or approved) occupation. Total training costs may not exceed \$4,000 per person per lifetime for certificate programs or \$6,000 per person per lifetime for associate or higher degree programs and total supportive services may not exceed \$2,000 per person per lifetime plus childcare for the duration of training (at the current CCDS rate) for income eligible participants unless specifically authorized in writing by DCI (or manager if so delegated) or the funding source. For individuals participating in a long-term customized training program total training costs will be limited to the actual cost of the customized training.
- d. Short-term remedial education of less than 6 months is authorized for individuals with a high school or G.E.D. diploma whose pre-enrollment academic assessment (using the Test of Adult Basic Education (TABE) or similar instrument) indicates an academic level of not less than 10.0. Total training costs may not exceed \$1,000 per person per lifetime and total supportive services may not exceed \$1,000 per person per lifetime

plus childcare for the duration of training (at the current CCDS rate) for income eligible participants unless specifically authorized in writing by DCI (or the manager if so delegated) or the funding source. Individuals who have not achieved an academic level of 12.0 or higher after remedial education funded by DCI are not eligible for further training funded by DCI but are eligible for G.E.D. preparatory education at any City Learning and Leadership Development Center.

- e. Adult Basic Education (ABE) is authorized for any individual whose pre-enrollment academic assessment (using the Test of Adult Basic Education (TABE) or similar instrument) indicates an academic level of less than 10.0. All ABE will be provided via a COSA Learning and Leadership Development Center or other designated education provider depending on the participant's needs. Total training costs may not exceed \$1,000 per person per lifetime and total supportive services may not exceed \$1,000 per person per lifetime for income eligible participants unless specifically authorized by DCI or the funding source in writing.

All direct (i.e. out-of-pocket) training and supportive service costs for each participant must be properly documented in the Agency's fiscal records and in the participant's individual case or student file. If tools are provided to the participant for job training, the participant must acknowledge receipt of the tools on an inventory form and sign an agreement to return the tools if the training program is not completed. The cost of non-cash services such as case management, referral, follow-up, etc. need not be calculated or considered in terms of this policy.

All participants needing training should complete a career exploration process before any funds are committed by the Agency. Once training has commenced, a change in the targeted demand occupation is allowed only once per participant.

Additionally, all participants who are eligible for Pell grants or other local, state or federal sources of financial aid must show proof of application for such funds before COSA funds may be used for training or support. Any grant funds awarded will be included in the calculation of the individual's income for DCI eligibility determination. Pell or scholarship funds can be used for training or living expenses or both if permitted by the source of such funds.

SUPPORTIVE SERVICE REQUIREMENTS

DCI's training and support service programs are designed to facilitate the coordination of community resources and, when possible, minimize or eliminate the possible duplication of services with other service providers. Accordingly, in coordination with the United Way 211 referral resource, DCI will provide divisions and agencies with a referral listing(s) that includes the location and contact information of other agencies/programs that provide various supportive services. When applicable, Delegate Agency or Subcontractor staff should provide participants with a copy of the listing and refer participants to applicable programs or to their DCI sponsoring Division for assistance. A coordinated effort is needed to ensure participants are made aware of all available services.

It is DCI's policy to provide supportive services to program participants only if the service is not available via another source and only after other providers of these (or comparable) services have declined to provide the service to the participant because of funding, capacity or eligibility requirements. If a participant is referred to another DCI division for support services a record of the service (or denial) must be obtained from the servicing division and included in the casefile if

possible. For referrals outside of DCI a record of the participant's request and the provider's declination of the service (if available) must be included in the participant's file or, in the absence of a provider's declination, the participant may self-certify the declination.

Following are basic DCI supportive services that are potentially available to program participants. Dollar, time or other program limitations specified may not be exceeded except in cases where the funding source specifically authorizes different supportive services or service levels. When supportive services are provided, each (and all) services provided must be documented in the participant's case file.

Childcare: All applicants requesting or requiring purchased childcare services will first be referred to DCI's Childrens Resources Division to determine whether Headstart, Pre-Kinder, Homeless Childcare, Our City Cares or other programs are viable options in lieu of childcare. If no other programs are options, the applicant will be required to meet CCDS eligibility tests for income, employment, and training/education status before childcare services may be provided. Full or partial payment of childcare is available only to households that do not have an adult (responsible parent, relative, or guardian) available to provide this service. DCI provided funds may be used to support participants who meet CCDS eligibility requirements who are wait-listed by CCDS, but only for the period they are wait-listed. Any participant not meeting CCDS eligibility requirements may request a waiver for a specific period of time, which must be submitted in writing by the Agency for a determination by the DCI Director prior to any services being provided. If the division or agency provides childcare internally without purchasing such services from another provider the provisions of this section do not apply

Rental and Mortgage Assistance: If eligible, all applicants must first apply for assistance through DCI's Community Action Division, as well as any applicable local or state housing programs as funding of those programs may permit. Eligible applicants must have proof of rent/mortgage expenses and must also show proof of ability to continue payments after assistance is received. Assistance will first be provided via FEMA if the applicant is eligible. However, DCI allows rental and mortgage assistance for individuals who are not eligible for FEMA assistance provided that household income does not exceed the DCI's income eligibility requirements. Assistance is limited to \$500/year. The non-availability of other support services must be documented in the case file.

Utility Assistance: Program participants should first seek assistance through Projects WARM, REAP, and AGUA and the Water Meter Discount Affordability Program, all of which are administered by DCI in conjunction with SAWS and CPS. Individuals must qualify for each particular program based on income. If ineligible for assistance because of income, the manager may approve an exception if the individual's income does not exceed 200% of the FPL. In any case, DCI support for utility assistance may not exceed \$150 per household per year. The non-availability of other support services must be documented in the case file. Utility assistance is authorized for any form of direct utility assistance to include connection, reconnection and penalty fees but may not be used for utility deposits. All able-bodied individuals receiving utility assistance are expected to attend a course in personal financial literacy within six months of receiving the assistance.

Food Assistance: Program participants should first seek assistance through community food pantries, including the Food Bank, and other local, state or federal agencies, and should apply for food stamps if eligible. If such assistance is unavailable, DCI support for food assistance may be authorized and cannot exceed \$150 per household per year. The non-availability of other support services must be documented in the case file.

Exceptions are allowed in emergency situations, declared natural disasters or catastrophes (e.g. fire) but must be documented in the casefile (if one exists) and approved by the Director (or Division manager if so delegated.)

Temporary Shelter: For individuals not currently participating in another housing program, DCI may provide or arrange for temporary shelter for a maximum of seven nights per person per year for participants who are not otherwise participating in a DCI housing/shelter program. A participant's personal income may not exceed 125% of the FPL to receive this assistance.

Work Related Expenses: DCI support may include expenses for testing or examinations for licenses or certifications, uniforms and special occupational footwear, tools, clothing, and related training supplies. Such expenses may be authorized to a maximum of \$250 per person per year however "usual and customary" testing/licensing/certification fees for medical and technological occupations are authorized to a maximum of \$1,000 per person per lifetime. Work attire support is limited to a total of \$250 per person per lifetime.

Transportation: DCI supports bus expenses not to exceed \$20 per month per participant (or the cost of a monthly bus pass) and gas and other automobile expenses of up to \$5.00 per day and \$25 per week. If mileage reimbursement is allowed, the participant will be required to provide the Division or Agency with proof of liability insurance, and a daily log showing the date, odometer reading and amount of transportation expenses that were incurred. The log must be supported by receipts, coincide with the participant's program schedule, and will be retained by the Agency for program review purposes. Providers may opt to reimburse transportation costs at a flat per diem rate. The division or agency manager must approve any payment of more than \$25 in one week.

Healthcare: All participants requiring health care services will be referred to health care providers. Unless required for a specific training or education program (e.g. nursing) DCI does not cover any health related expense other than dental, vision, and pharmaceutical as specified below. The participant's case file must be documented to show when and to whom the medical referral was made.

Medical, Dental and Vision Care: Program participants may receive DCI support for medical, dental and vision care for participants up to \$100 per visit and a combined maximum of \$300 per year per person.

Pharmaceutical Assistance: Program participants may receive DCI support for prescription assistance up to \$150 per year per person.

Tax Assistance: Any participant requiring assistance preparing their federal income tax return should utilize DCI's no-cost VITA service provided they meet VITA eligibility requirements.

Stipends and Gift Cards: DCI funded programs may provide participants stipends and gift cards and other incentive items (such as t-shirts, ball caps, etc) for rewards, recruiting, and retention. DCI Delegate Agencies and Subcontractors must have written internal controls in-place to account for the purchase and distribution of stipends and gift cards. DCI programmatic and fiscal monitors will ensure that Agencies have adequate internal controls in-place at the beginning of each Agency contract and will assess their effectiveness during site visits and specifically via the joint Program Performance Review. If controls are not adequate, the Agency will be immediately prohibited from using stipends, gift cards, or other incentives until controls

are implemented, reviewed, and approved by DCI. Gift cards used to provide supportive services (e.g. food, pharmaceuticals) will follow eligibility and limitation guidelines as outlined above.

Agencies or Subcontractors providing a money stipend are required to maintain either time sheets or sign-in logs to confirm participation. Agencies will issue a check or other numbered instrument to the participant and maintain a log showing the names of the recipients of the stipends, their social security number, and their signature that acknowledges the receipt of the stipend. The log should include a statement explaining the reason for the issuance of the stipend.

A receipt showing the purchase of gift cards will be retained by the Agency and will be used to obtain reimbursement from DCI. Gift cards and highly pilferable incentives (electronic items, etc.) must be stored in a secure location (locked file or box) prior to their use. The distribution of gift cards requires a log showing the date, the name of the recipient, value of the gift card, reason for the issuance, and will include the signature of the recipient.

Food Purchases: Delegate Agencies and Subcontractors may purchase food for participants if the Agency's approved DCI budget supports the expenditure. Food purchase receipts must be retained by the Agency and show the food provider or store where the purchase was made, date of purchase, items purchased, and amount paid. When food items are dispersed or consumed, a log must be retained that shows the date, the program purpose, and a roster of those participants attending the program. Each participant should sign-in on the log to verify attendance. Customary refreshments for events or activities (as opposed to meals) may be provided for participants if the Agency's approved DCI budget supports the expenditure. A record of who consumed the refreshments is not required if the cost for such refreshments does not exceed \$25 per event or activity.

Other Supportive Services: Agencies may provide other services not specified in the policy by requesting approval from the Director in writing prior to providing such service.

APPROVED


Dennis J. Campa, Director
Department of Community Initiatives

Date Signed: 1/30/04

ATTACHMENT A

Federal Poverty Level For 2003

| Family Size | FPL (2003) | 125% of FPL | 150% of FPL | 200% of FPL |
|-------------|--------------------|--------------------|--------------------|--------------------|
| 1 | \$ 8,980 | \$11,225 | \$13,470 | \$17,960 |
| 2 | \$12,120 | \$15,150 | \$18,180 | \$24,240 |
| 3 | \$15,260 | \$19,075 | \$22,890 | \$30,520 |
| 4 | \$18,400 | \$23,000 | \$27,600 | \$36,800 |
| 5 | \$21,540 | \$26,925 | \$32,310 | \$43,080 |
| 6 | \$24,680 | \$30,850 | \$37,020 | \$49,360 |
| 7 | \$27,820 | \$34,775 | \$41,730 | \$55,640 |
| 8 | \$30,960 | \$38,700 | \$46,440 | \$61,920 |
| 9+ | Add \$3,140/person | Add\$3,925/ person | Add \$4,710/person | Add \$6,280/person |

| Service | Eligibility Requirements | Program Requirements | Limitations/Exceptions |
|----------------------------------|---|--|---|
| Job/Skill Training – S.T. | DCI Basic Income Eligibility for Spt Svc Program requirements as applicable Enrollment at TWC if eligible | Training of less than 6 months Goal is placement in transitional job Must apply for all applicable financial aid | \$1,000(T) + \$1,000(SS)/person/lifetime + Childcare during training |
| Job/Skill Training – S.T. | DCI Basic Income Eligibility for Spt Svc Program requirements as applicable Enrollment at TWC if eligible | Training of less than 6 months Skill certificate/license producing Goal is job placement at living wage Must apply for all applicable financial aid | \$2,000(T) + \$1,000(SS)/person/lifetime + Childcare during training |
| Job/Skill Training – L.T. | DCI Basic Income Eligibility for Spt Svc Program requirements as applicable Enrollment at TWC if eligible | Training in approved or Demand Occupation Degree/certificate/license producing Goal is job placement Must apply for all applicable financial aid | \$4,000(T) or \$6,000 (T)/person/lifetime \$2,000(SS)/person/lifetime + Childcare during training 1 occupation change/person |
| Training Related Expenses | DCI Basic Income Eligibility Spt Svc Enrollment in job/skill training | Applicable to specific job training | \$250/year for supplies \$250/person/lifetime for attire \$20/month for bus transportation \$25/week for auto expenses |
| Childcare | CCDS requirements | Must apply for all other applicable programs 1 st Must meet CCDS requirements | CCDS limit/child/year |
| Utility Assistance | DCI Basic Income Eligibility | Must apply for all other applicable programs 1 st | \$150/household/year |
| Food Assistance | DCI Basic Income Eligibility | Must apply for all other applicable programs 1 st Must apply for food stamps if eligible | \$150/household/year |
| Temporary Shelter | Maximum 125% FPL | Must apply for all other applicable programs 1 st | 7 days/family/year |
| Rental/Mortgage Assistance | FEMA Guidelines | Must apply for FEMA and other assistance Proof of ability to continue payments | Maximum \$500 per year/household |
| Medical/Dental/Vision Assistance | Enrollment in authorized DCI program | Required per medical specialist | \$100/vist \$300/person/year |
| Pharmaceutical Assistance | Enrollment in authorized DCI program | Required per medical specialist | \$150/person/year |
| Gift cards/Incentives | Enrollment in authorized DCI program | Must be approved budget line-item | \$250/person/year |
| Life Skills Training | DCI Basic Income Eligibility Program requirements as applicable | Must apply for all applicable financial aid | \$500/person/year |
| Education (Remedial) | DCI Basic Income Eligibility Program requirements as applicable Must TABE >10.0 | Possess GED/HS diploma or degree Required for training in approved occupation Must apply for all applicable financial aid | \$1,000(T) + \$1,000(SS)/person/lifetime + Childcare during training |
| Education (ABE) | DCI Basic Income Eligibility Program requirements as applicable TABE < 10.0 | Use of LLDC's or DCI specified location/program Must apply for all applicable financial aid | \$1,000(T) + \$1,000(SS)/person/lifetime |
| All Other | DCI Basic Income Eligibility Enrollment in authorized DCI program | Per applicable program | Maximum/person per funding source |

Target (Demand) Occupations Per TWC/AWD 2003/2004

| Title | Title |
|--|---|
| Accountant and Auditor | Heating, A/C & Refrigeration Mechanic & Installer |
| Aircraft Mechanic & Service Technician | Licensed Practical/Vocational Nurse |
| Automotive Service Technician & Mechanic | Medical & Clinical Laboratory Technician |
| Avionics Technician | Medical Assistant |
| Bill & Account Collector | Medical Records & Health Information Technician |
| Bio-medical Equipment Repairer | Middle School Teacher |
| Bookkeeping, Accounting and Auditing Clerk | Network & Computer Systems Administrator |
| Carpenter | Pharmacy Technician |
| Certified Nurses Aide | Plumbers, Pipe Fitters & Steamfitters |
| Claims Adjuster, Examiner & Examiner | Police & Sheriff's Patrol Officer |
| Computer and Information Systems Manager | Radiology Technologist |
| Computer Security Specialist | Registered Nurse |
| Computer Software Engineer, Application | Respiratory Therapist |
| Computer Software Engineer, Sys Software | Secretary, Excluding Legal, Medical & Executive |
| Computer Support Specialist | Shipping, Receiving & Traffic Clerk |
| Computer Systems Analyst | Surgical Technologist |
| Correctional Officer & Jailer | Teacher Assistant |
| Dental Assistant | Teacher: Elementary, Middle, Secondary |
| Electrician | Teacher: Special Ed, Preschool, Kindergarten |
| Elementary School Teacher | Team Assembler |
| Executive Secretary & Administrative Asst | Telemarketeer |
| General Office Clerk | Truck Driver, Heavy & Tractor Trailer |
| | Truck Driver, Light or Delivery Service |